

**FILED**

**MAY 25 2022**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRIE LADELL CAMPBELL,

Defendant.

) INDICTMENT

) **JUDGE ADAMS**

) **1 : 22 CR 268**

) CASE NO.

) Title 21, United States Code,  
) Sections 841(a)(1), (b)(1)(A) and  
) 846; Title 18, United States Code,  
) Sections 922(g)(1) and 1952(a)(3)

COUNT 1

**MAG JUDGE KNAPP**

(Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl, 21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about May 9, 2022, to on or about May 11, 2022, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant LARRIE LADELL CAMPBELL and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Interstate Travel in Aid of Racketeering, 18 U.S.C. § 1952(a)(3))

2. On or about May 10, 2022, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant LARRIE LADELL CAMPBELL traveled in interstate commerce from the State of Arizona to the State of Ohio with the intent to promote, manage, establish, carry on

and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, Conspiracy to Distribute and Possess with Intent to Distribute Fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, all in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 3

(Attempted Possession of Fentanyl with Intent to Distribute, 21 U.S.C. § 846)

The Grand Jury further charges:

3. On or about May 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant LARRIE LADELL CAMPBELL did knowingly and intentionally attempt to possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 4

(Felon in Possession of Firearm and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

4. On or about May 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant LARRIE LADELL CAMPBELL, knowing he had been previously convicted of crimes punishable by imprisonment for a term exceeding one year, those being: Drug Possession (F-3), on or about January 3, 2013, in the Cuyahoga County Common Pleas Court, in case number CR-12-567645; and Drug Possession (F-3), on or about April 4, 2007 in the Cuyahoga County Common Pleas Court, in case number CR-06-488953, knowingly possessed in and affecting interstate commerce a firearm and ammunition, to wit: a Taurus, model PT140G2

semi-automatic handgun, bearing serial number SGZ58610, loaded with 11 rounds of ammunition, said firearm and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

5. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1); and Title 28 United States Code, Section 2461(c), the allegations of Counts 1 through 4 are incorporated herein by reference. As a result of the foregoing offenses, defendant LARRIE LADELL CAMPBELL shall forfeit to the United States any and all property constituting, or derived from, any proceeds he obtained, directly or indirectly, as the result of such violations; and any and all of his property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and/or any property real or personal, which constitutes or is derived from proceeds traceable to the violations set forth herein; and, any firearm and ammunition involved in, or used in violation of the charges set forth herein; including, but not limited to, the following: a Taurus, model PT140G2 semi-automatic handgun, bearing serial number SGZ58610, loaded with 11 rounds of ammunition.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.